

DISTRICT ATTORNEY KINGS COUNTY

350 JAY STREET BROOKLYN, NY 11201-2908 (718) 250-2000 WWW.BROOKLYNDA.ORG

> [INSERT NAME] Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]

Kings County Dkt./Ind. No. [#######]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: JUNKAO ZHANG

MOS TAX:

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in <u>limine</u> to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

MOS ZHANG PLED GUILTY TO THE FOLLOWING NYPD DEPARTMENTAL CHARGES AND SPECIFICATIONS, DATED 08/21/2009, WHILE MOS ZHANG WAS ASSIGNED TO THE BROOKLYN VICE ENFORCEMENT SQUAD: ALLEGATION(S):

- MOS ZHANG, WHILE ON DUTY ON OR ABOUT AND BETWEEN 01/24/2009 AND 01/31/2009, ENGAGED
 IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY AND DISCIPLINE OF THE DEPARTMENT, TO
 WIT: MOS ZHANG CONDUCTED AN IMPROPER INVESTIGATION DUIRING AN UNDERCOVER OPERATION.
- MOS ZHANG, DATE AND LOCATION KNOWN TO THE DEPARTMENT, DID WRONGFULLY MAKE FALSE AND INCOMPLETE ENTRIES IN SAID MOS'S DAILY ACTIVITY REPORT.
- MOS ZHANG, DATE AND LOCATION KNOWN TO THE DEPARTMENT, ENGAGED IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY AND DISCIPLINE OF THE DEPARTMENT IN THAT MOS ZHANG WRONGFULLY MADE FALSE ENTRIES REGARDING AN UNDERCOVER VICE OPERATION IN DEPARTMENT RECORDS TO WIT: A DDS FORM.

CASE STATUS: CLOSED ON 11/03/2010

ACTION TAKEN: FORFEITURE OF FORTY-FIVE (45) VACATION DAYS, ONE (1) YEAR OF DISMISSAL PROBATION

Disclosure # 2:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 08/21/2010, AGAINST MOS ZHANG: ALLEGATION(S):

DEPARTMENT RULES AND VIOLATIONS - DAMAGE TO DEPARTMENT VEHICLE

ACTION TAKEN: LETTER OF INSTRUCTION CASE STATUS: CLOSED ON 01/23/2013

BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE UNAWARE OF ANY PENDING AND OR SUBSTANTIATED CCRB ALLEGATIONS AGAINST THIS OFFICER.

Eric Gonzalez District Attorney Kings County